



Re: Thread Wallets vs. Brixley Bags | Depo Follow-Up [IMAN-DMS1.FID2327228]

From Bud Todd <btodd@kba.law>

Date Mon 10/28/2024 6:10 PM

To Brittany Frandsen <BFrandsen@WNLaw.com>; David P. Johnson <DJohnson@WNLaw.com>

Cc Chad Pehrson <cpehrson@kba.law>

Hi Brittany,

Thank you for the follow-up email. As you know, we believed that the WhatsApp photos were produced on Jun 28, 2024. Thank you for informing us last week that you were not able to access them. The files are available at the below link:

<https://www.dropbox.com/scl/fo/5k6g7g4ilt95g35hmv6w5/AOemOo7YopQseCU7ZcpbN18?rlkey=6kifds2v2wjv8x0hmzhhz1n6l&dl=0>

Please note that these files have been designated AEO. Also, there were 112 videos within the whatsapp files. Those videos are conveyed in native format and have all been bates-stamped within the file name Brixley_6539_[x]. Each video is hereby designated AEO as well.

As for the records referenced in Exhibit 23, we are currently reviewing those. We should have those documents over to you in the next few days.

Thank you,



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From: Brittany Frandsen <BFrandsen@WNLaw.com>

Sent: Monday, October 28, 2024 4:04 PM

To: Bud Todd <btodd@kba.law>; Chad Pehrson <cpehrson@kba.law>

Cc: David P. Johnson <DJohnson@WNLaw.com>

Subject: Thread Wallets vs. Brixley Bags | Depo Follow-Up [IMAN-DMS1.FID2327228]

- EXTERNAL EMAIL -
Bud,

I have a few follow-up items from Kimberly's depo last week. First, as you probably remember, we discovered that Brixley has not produced all the images Kimberly sent to and/or received from her manufacturer through WhatsApp. I understand you are working on downloading and producing those images. Do you have a general timeframe for when those will be produced?

Second, during the deposition, I asked Kimberly about Exhibit 23, which shows text messages between Kimberly and Ethan regarding screenshots of social media posts referencing Brixley and/or Thread. As you may recall, one of the texts from Ethan reads, "At least we have record of it." Kimberly testified that she believed they took screenshots of those posts and comments. Any such records would be responsive to Thread's discovery requests and should have been produced already. Will you please let us know if those records exist and if you have a timeframe for when they will be produced?

Lastly, at the end of the deposition, we briefly discussed exploring settlement options. Please let me know if you think it would be productive to discuss settlement options and, if so, how you propose we proceed.

Thank you,

Brittany Frandsen

Shareholder

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